

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
Free Speech Systems LLC	§	Subchapter V
	§	
Debtor.	§	Case No. 22-60043 (cml)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

NEIL HESLIN, SCARLETT LEWIS,	§	
LEONARD POZNER, VERONIQUE DE	§	
LA ROSA, MARCEL FONTAINE,	§	
	§	
Plaintiffs	§	
	§	
v.	§	Adv. Pro. No. 22-06017-mmp
	§	
ALEX E. JONES, FREE SPEECH,	§	
SYSTEMS, LLC, PQPR HOLDINGS	§	
LIMITED, LLC, PLJR HOLDINGS, LLC	§	
PLJR HOLDINGS LIMITED, LLC,	§	
CAROL JONES, DAVID JONES,	§	
AEJ HOLDINGS, LLC, AEJ TRUST 2018,	§	
	§	
Defendants	§	
	§	
DAVID WHEELER, FRANCINE	§	
WHEELER, JACQUELINE BARDEN,	§	
MARK BARDEN, NICOLE HOCKLEY,	§	
IAN HOCKLEY, JENNIFER HENSEL,	§	
DONNA SOTO, CARLEE SOTO PARISI,	§	
CARLOS M. SOTO, JILLIAN SOTO,	§	
WILLIAM SHERLACH, ROBERT PARKER,	§	
WILLIAM ALDENBERG,	§	
	§	
Intervenors	§	

**TEXAS PLAINTIFFS' REMOVAL STATEMENT PURSUANT TO BANKRUPTCY
RULE 9027(e)(3)**

Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (collectively, “**Texas Plaintiffs**”), creditors and parties in interest in the above-referenced case, file their statement pursuant to Bankruptcy Rule 9027(e)(3), and respectfully state as follows:

1. Texas Plaintiffs do not consent to entry of final orders or judgment by the bankruptcy judge.
2. Texas Plaintiffs demand a jury trial.
3. This statement is filed and signed pursuant to, and with an awareness of, Bankruptcy Rule 9011, as required by Bankruptcy Rule 9027(e)(3).

Respectfully submitted this 10th day of November 2022.

MCDOWELL HETHERINGTON LLP

Avi Moshenberg
State Bar No. 24083532
1001 Fannin Street, Suite 2700
Houston, Texas 77002
Phone: (713) 337-5580
Fax: (713) 337-8850
Email: avi.moshenberg@mhllp.com

Attorneys for Texas Plaintiffs

**CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, P.C.**

/s/ Jarrod B. Martin
Jarrod B. Martin
State Bar No. 24070221
1200 Smith Street, Suite 1400
Houston, Texas 77002
Phone: (713) 356-1280
Fax: (713) 658-2553
Email: Jarrod.Martin@chamberlainlaw.com

Bankruptcy Counsel for Texas Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing notice has been served upon all parties eligible to receive electronic notice of filings through the Court's CM/ECF system on November 10, 2022 and via email as follows:

Raymond W. Battaglia
rbattagliaw@outlook.com
LAW OFFICE OF RAYMOND W. BATTAGLIA
66 Granburg Circle
San Antonio, Texas 78218

F. Andino Reynal
areynal@frlaw.com
FERTITTA & REYNAL LLP
917 Franklin St., Ste. 600
Houston, Texas 77002

Shelby Jordan
sjordan@jhwclaw.com
JORDAN & ORTIZ, P.C.
500 N. Shoreline Blvd., Ste. 900
Corpus Christi, Texas 78401

Stephen Lemmon
lemmon@slollp.com
STREUSAND, LANDON, OZBURN & LEMMON, LLP
1801 S. MoPac Expwy., Suite 320
Austin, Texas 78746

Stephen A. Roberts
sroberts@srobertslawfirm.com
STEPHEN A. ROBERTS, PC
1400 Marshall Lane
Austin, Texas 78703

Ryan E. Chapple
rchapple@cstrial.com
CAIN & SKARNULIS PLLC
303 Colorado Street, Suite 2850
Austin, Texas 78701

/s/ Jarrod B. Martin
Jarrod B. Martin